

EXHIBIT B



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July 2, 2018

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VIA EMAIL

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Re: *David A. Joffe v. King & Spalding LLP*
17 Civ. 3392 (VEC)

Dear Andrew:

We previously agreed that the parties would jointly ask the Court to extend the deadline to complete expert discovery from August 3 to September 7. We also agreed to exchange affirmative expert reports on or before July 10, exchange rebuttal expert reports on or before August 10, and complete all expert depositions on or before September 7.

After we confirmed last Monday that the proposed schedule worked for our client, you asked us on Tuesday if we would prepare a draft of the joint letter to the Court requesting the extension, and we sent you a draft that same day.

On Wednesday, and before the joint letter was submitted to the Court, you filed a motion to stay this case until August 22, 2018 and to submit an *ex parte* motion to withdraw pursuant to Local Civil Rule 1.4. (Dkt. 75.) On Friday, the Court denied your request to stay the case pending the resolution of your motion to withdraw and set July 6 as the deadline for you to file your withdrawal motion. (Dkt. 76.) At your request, the Court extended this deadline to July 13. (Dkt. 78.)

I understand that you spoke with Pinny Goldberg on Friday and advised him that you did not know whether Plaintiff would be able to produce his expert report(s) by the July 10 date we had agreed to. Because the Court has not stayed this case or extended the August 3 expert discovery deadline, and because your motion to withdraw is not due to be filed until July 13—which is after the proposed July 10 deadline—please be advised that Defendant intends to serve its expert report on or before July 10, as we previously agreed. We ask that Plaintiff also produce his expert report(s), if any, by July 10 as well.

Defendant reserves all rights to address this issue with the Court.



Very truly yours,

/s/ Joseph Baumgarten

Joseph Baumgarten

cc: Pinchos Goldberg